



The Planning Inspectorate

Independent Examination of the Lewisham Local Plan

Inspectors Matters, Issues and Questions for Examination

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N.B Reference to the National Planning Policy Framework (NPPF) throughout the MIQs refers to the September 2023 version.

MATTER 1 – LEGAL/PROCEDURAL REQUIREMENTS

ISSUE – Whether the Council has complied with the relevant procedural and legal requirements.

Plan preparation

- Q1.1 Has the preparation of the Plan been in accordance with the Local Development Scheme in terms of its form, scope and timing?
- Q1.2 Have requirements been met in terms of the preparation of the Plan, notification, consultation and publication and submission of documents, including the submission Policies Map and the evidence base?
- Q1.3 What are the strategic matters relevant to the preparation of the Plan (as defined by s33A(4) of the Planning and Compulsory Purchase Act 2004)?
- Q1.4 For each of the points above who has the Council co-operated with during the preparation of the Plan, what form has this taken? What has been the outcome of this co-operation?

Sustainability Appraisal/Integrated Impact Assessment

- Q1.5 How has the Sustainability Appraisal (SA)/Integrated Assessment (IIA) informed the preparation of the Plan at each stage?
- Q1.6 Does the SA/IIA assess all reasonable alternative spatial strategy options, levels of housing and employment need and options relating to other policies in the Plan? Where is it considered that there are no reasonable alternatives and is this clearly explained?
- Q1.7 Has the methodology for the SA/IA been appropriate? Was it based on reasonable and up-to-date evidence? What concerns have been raised and what is the Council's response to these? Have the requirements for Strategic Environmental Assessment been met?

Habitats Regulations Assessment

- Q1.8 Does the Habitats Regulations Assessment (HRA) comply with the relevant legal requirements and are there any reasons to suggest that its conclusions are incorrect?

Strategic Policies

- Q1.9 Does the Plan clearly identify the strategic policies, as per paragraph 21 of NPPF and s19 (1B-E) of the Planning and Compulsory Purchase Act 2004?
- Q1.10 The Plan sets out 97 out of 105 strategic policies. Are all of these genuinely strategic?

Q1.11 How has the work referred to in paragraph 4.3 of the Council's response (LC3) to the Inspectors' Initial Questions (LC2) been completed? What is the outcome of this work?

Equalities

Q1.12 Have all relevant groups with protected characteristics been identified? Have their needs been taken into account in preparing the Plan?

MATTER 2 – THE DUTY TO COOPERATE

ISSUE – Whether the Council has complied with the Duty to Cooperate in the preparation of the Local Plan.

Q2.1 Have any substantial concerns been raised in terms of compliance with the Duty to Cooperate?

Q2.2 Has the additional information included in the Council's response to the Inspectors' Initial Questions (LC3) sufficiently demonstrated that it has met the Duty to Cooperate?

Q2.3 What is the progress with the remaining Statements of Common Ground? Are there any outstanding issues?

Q2.4 In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan?

Overall Housing Provision

Q2.5 Who has the Council engaged with in terms of overall housing provision? What was the outcome of this engagement?

Q2.6 Specifically, what discussions took place regarding the rolling forward of the London Plan target beyond the 10 years?

Q2.7 What discussions took place regarding the use of the Local Housing Need Figure, including whether adjoining authorities could accommodate any unmet need?

Employment/industrial capacity

Q2.8 Who has the Council engaged with in terms of employment and industrial capacity? What was the outcome of this engagement?

Q2.9 What is the progress with the SoCG with the GLA? Does this resolve the GLA concerns regarding the conformity of the Local Plan's approach regarding employment/industrial capacity?

Q2.10 Does the Council's Employment Background Paper (LC6) resolve the GLA's outstanding concerns regarding employment/industrial capacity?

Bakerloo Line Extension

Q2.11 Who has the Council engaged with in terms of the Bakerloo Line Extension? What was the outcome of this engagement?

Other strategic issues

Q2.12 Are there any other strategic issues on which the Council has engaged? What was the outcome of this engagement?

Q2.13 In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan?

MATTER 3 – Whether the vision, objectives and spatial strategy are justified, effective, consistent with national policy and in general conformity with the London Plan.

Vision and Objectives

Q3.1 Are the vision, strategic themes and objectives justified by the evidence and do they reflect the issues and challenges facing the Borough?

Q3.2 Is it clear how the Plan policies will help to deliver the vision and objectives over the Plan period?

Q3.3 Are the vision, strategic themes and objectives consistent with the London Plan's Good Growth objectives?

Q3.4 Are any main modifications necessary for soundness?

THE SPATIAL STRATEGY (Policy OL1)

Spatial Strategy Options

Q3.5 What is the basis of the spatial strategy set out at Policy OL1? Which strategic options were considered? Is the approach justified?

Q3.6 Which sub area options were considered? Is the approach justified?

Q3.7 Which factors determined growth being either held constant or increased in each of the sub-areas?

Q3.8 Of the various scenarios and options considered in the IIA which option was selected as a basis for the spatial strategy.

Q3.9 Scenario 1 of the IIA is referred to as the 'No BLE' option which assumes that the Bakerloo Line Extension is '*unlikely to be delivered during the plan period and as a consequence growth will be delivered at the projected baseline position*'. However, Appendix 6, the Housing Trajectory includes potential increased intensity uplift towards the end

of the Plan period. Has Scenario 1 plus the additional uplift been assessed in the IIA?

- Q3.10 The IIA considered six reasonable alternative Growth Scenarios and assessed how they performed against environmental, economic and social factors (Section 6). Section 7 of the IIA 'Developing the preferred approach' quotes the Council's response to the assessment of Growth Scenarios which seeks to set out the rationale for the selection of the Preferred Scenario. However, this presents the Council's reasons for supporting the preferred option and it is not clear from this short response (which the IIA clarifies is not an 'assessment'), how the IIA has influenced the choice of the preferred option or indeed why alternative scenarios have been discounted. On this basis:
- a) How did the IIA and HRA influence the selection of the preferred option?
 - b) How did the IIA and HRA influence the discounting of the other reasonable scenarios?
 - c) What is the rationale and decision-taking process for selecting the preferred option? Where is this set out?

Spatial Strategy (Policy OR1)

- Q3.11 Does the Plan adequately set out an overall strategy for the pattern, scale and quality of development as required by paragraph 20 of the NPPF?
- Q3.12 Is this sufficiently clear to decision-takers, developers and local communities?
- Q3.13 Is the spatial strategy consistent with the spatial development patterns set out at Chapter 2 of the London Plan?
- Q3.14 How were the Growth Nodes at Policy OL1Aa identified? Are they justified by the evidence? Are they adequately defined in Policy OL1, supporting text and Policies Map?
- Q3.15 Are the Opportunity Areas clearly defined in Policy OL1 and the Policies Map?
- Q3.16 Does Policy OL1 clearly set out the scale of development which the Plan expects in the two Opportunity Areas of New Cross/Lewisham/Catford and Deptford Creek/Greenwich Riverside?
- Q3.17 Is the scale of housing and employment development proposed in the Opportunity Areas consistent with that set out at Table 2.1 of the London Plan?

- Q3.18 How were the Regeneration Nodes at Policy OL1Aa identified? Are they justified by the evidence? Are they adequately defined in Policy OL1Aa, supporting text and policies map?
- Q3.19 How was the Strategic Area for Regeneration set out at OL1Ab identified? Is it justified by the evidence? Is it adequately identified in the Policy OL1Ab, supporting text and policies map?
- Q3.20 How was the hierarchy of centres, set out at Policy OL1C identified? Is the hierarchy justified by the evidence? Is it consistent with the Policy SD8 (figure 2.17/Annex 1) of the London Plan?
- Q3.21 How is the A21 Growth Corridor identified? Is it justified by the evidence? How does it relate to the Growth Nodes; Opportunity Areas; Regeneration Nodes; and the Strategic Area of Regeneration?
- Q3.22 Policy OL1Ad refers to 'other Strategic Growth Corridors'. Are these adequately defined in Policy OL1Ad, supporting text and the policies map? Are these justified by the evidence?
- Q3.23 What is the timeframe for the completion of the Bakerloo Line Extension as referred to in Policy OL1E?
- Q3.24 Does the Plan adequately identify development opportunities which may arise as a result of the Bakerloo Line Extension and set out how these would be phased to reflect the connectivity and capacity benefits it unlocks in accordance with paragraph 2.1.15 of the London Plan?
- Q3.25 Does Policy OL1 give adequate guidance for areas outside of identified Growth Nodes/Regeneration Node/Opportunity Areas/Strategic Area for Regeneration. How would these be dealt with?
- Q3.26 Are the housing, employment, and town centre allocations consistent with Scenario 1 in terms of the parameters discussed within the IIA, both at a Plan level and a sub-area level?
- Q3.27 Overall, is the spatial strategy in general conformity with the London Plan and the NPPF?

MATTER 4 – THE HOUSING TARGET/REQUIREMENT

ISSUE – Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy and in general conformity with the London Plan in relation to the overall provision for housing and the housing requirement?

Relevant policy – HO1

- Q4.1 Is the housing requirement set in Policy HO1 in general conformity with the London Plan?
- Q4.2 The housing target goes to 2037/38. Should it extend to 2040 in accordance with the Plan period?
- Q4.3 In light of the December 2023 Housing Delivery Test Result should a 20% buffer be applied to the initial 5-year housing land supply as opposed to a 5% buffer? If so, how would the additional capacity be achieved? In addition, has the implication of a higher housing requirement been assessed through the SA/IIA and HRA?
- Q4.4 Is it appropriate to make an additional allowance to reflect the current backlog? Is this approach consistent with the London Plan and the NPPF?
- Q4.5 The SHMA (2022) undertakes an assessment of Local Housing Need (LHN) in accordance with the Standard Methodology which results in a significantly higher level of housing need (*3,336 dpa 2021-2031, or 2,334 dpa when capped at 40% above the housing requirement figures set out in existing policy, for example 40% above the London Plan housing target of 1,667*). What is the rationale for discounting the LHN?
- Q4.6 How do the results of the London Strategic Housing Land Availability Assessment (2017) and the more recent local update of capacity influence the Council's decision to discount the Local Housing Need/Standard Methodology approach. How much housing capacity (expressed in terms of the number of dwellings) does the London Strategic Housing Land Availability Assessment/ local update identify for Lewisham for the Plan period?
- Q4.7 Paragraph 8.1 of the Council's response to the initial Questions (LC3) states that 'it is evident that the Standard Method LHN, capped at 2,334 dpa cannot be fully accommodated within the Local Plan period'. How far short does the capacity fall of the LHN (in terms of numbers of dwellings) (with and without the additional uplift from the Bakerloo Line Extension [2,474 dwellings]).
- Q4.8 Is the approach of rolling forward the London Plan housing target for the remainder of the Plan period based on realistic assumptions of demographic growth (overall population; households; migration)?

- Q4.9 What are the exceptional local circumstances that justify deviating from the standard method?
- Q4.10 What are the implications of not taking forward the higher LHN requirement in terms of meeting housing need in the Borough?
- Q4.11 In overall terms, is the overall housing target of at least 27,730 net housing completions over a 15-year period set out in Policy HO1 appropriate and justified?

MATTER 5 – OTHER HOUSING REQUIREMENTS

ISSUE – WHETHER THE LOCAL PLAN HAS BEEN POSITIVELY PREPARED AND WHETHER IT IS JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY AND IN GENERAL CONFORMITY WITH THE LONDON PLAN IN RELATION TO THE PROVISION FOR OTHER HOUSING REQUIREMENTS.

Relevant Policies – HO1, HO3, HO5, HO6, HO7, HO8, HO9, HO10

Housing Choice and Mix (*Policy HO1*)

- Q5.1 What is the evidence in relation to housing mix?
- Q5.2 Do parts D, E, F and G of Policy HO1 provide sufficient guidance to developers in terms of housing mix?
- Q5.3 Is the approach to Build for Rent appropriate, supported by the evidence and in general conformity with London Plan Policy H11.

Affordable Housing (*Policies HO1; HO3*)

- Q5.4 What is the evidence in relation to affordable housing and what does it show?
- Q5.5 What are the past trends in affordable housing in terms of completions and forms of delivery? How is this likely to change in the future?
- Q5.6 What is the justification for the strategic target for 50 % of all new homes delivered in the Borough to be for genuinely affordable housing? Is there evidence to support the 50% target?
- Q5.7 Is it clear what is meant by 'genuinely affordable housing' in Policies HO1 and HO3? Where is this defined?
- Q5.8 How will the 50% target be achieved given the minimum 35% initial threshold in Part A of Policy HO1?
- Q5.9 What is the basis for the proposed tenure split in Part Eb of Policy HO3?
- Q5.10 Is the 'threshold approach' to viability set out at Part F of Policy HO3, including the threshold levels appropriate and justified by the evidence?

- Q5.11 Is the Viability Tested Route set out at Part G of Policy HO3 appropriate and justified by the evidence?
- Q5.12 What is the basis for the target unit size mix for affordable housing set out in Table 7.1 of Policy HO1?
- Q5.13 Is the approach to off-site provision set out at Part I of Policy HO3 sufficiently clear?
- Q5.14 Is the approach to the provision of affordable housing on small sites of between 2 and 9 dwellings set out in Part J of Policy HO3 consistent with paragraph 64 of the NPPF? If not, what is the evidence to support taking a different approach?
- Q5.15 Would Table 7.3 sit better within the supporting text to Policy HO3?
- Q5.16 In light of the Written Ministerial Statement of 24 May 2021 regarding First Homes, what is the evidence to support the stance not to make provision for First Homes?
- Q5.17 Is the approach to Vacant Building Credit in Part M of Policy HO3 justified?
- Q5.18 Are the policies sufficiently flexible?
- Q5.19 Are Policies HO1 and HO3 consistent with the NPPF in terms of affordable housing and are they in general conformity with the London Plan?

Accommodation for Older People (*Policy HO5*)

- Q5.20 What is the evidence in relation to the need for older people's accommodation in the Borough? Would the approach set out in Policy HO5 enable the identified need to be met?
- Q5.21 Does Policy HO5 provide sufficient guidance to developers in terms of older person's housing?
- Q5.22 In overall terms, is Policy HO5 justified, effective and consistent with the NPPF and in general conformity with the London Plan?

Supported and Specialist Accommodation (*Policy HO6*)

- Q5.23 What is the evidence in relation to the need for Supported and Specialist accommodation in the Borough? Would the approach set out in Policy HO6 enable the need to be met?
- Q5.24 Does Policy HO6 provide sufficient guidance to developers in terms of older people's housing?
- Q5.25 In overall terms is Policy HO6 justified, effective and consistent with the NPPF and in general conformity with the London Plan?

Purpose-Built Student Accommodation (*Policy HO7*)

- Q5.26 What is the evidence in relation to the need for Purpose Built Student Accommodation? Would the approach set out in Policy HO7 enable the need to be met?
- Q5.27 Does Policy HO7 provide sufficient guidance to developers in terms of purpose-built student accommodation?
- Q5.28 Should the London Plan affordable requirement of 35% be included in the policy itself as opposed to the supporting text at paragraph 7.59?
- Q5.29 In overall terms is Policy HO7 justified, effective and consistent with the NPPF and in general conformity with the London Plan?

Housing with shared facilities (Houses in Multiple Occupation (HMO)) (*Policy HO8*)

- Q5.30 What is the evidence in terms of housing with shared facilities (Houses in Multiple Occupation)?
- Q5.31 Does Policy HO8 provide sufficient guidance to developers in terms of Housing with Shared Facilities (HMOs)?
- Q5.32 In overall terms, is Policy HO8 justified, effective and consistent with the London Plan?

Self-build and custom build housing (*Policy HO9*)

- Q5.33 What is the evidence in terms of self-build and custom build housing? Would the approach set out in Policy HO9 meet the identified need?
- Q5.34 Does Policy HO9 provide sufficient guidance for developers and prospective self/custom builders?
- Q5.35 In overall terms, is Policy HO9 justified, effective and consistent with the London Plan?

Gypsy and Traveller Accommodation (*Policy HO10*) (site dealt with separately in site allocations)

- Q5.36 What is the evidence in terms of the need for additional Gypsy and Traveller Accommodation provision? Was the methodology for the assessment appropriate and robust?
- Q5.37 The Lewisham Gypsy and Traveller Accommodation Assessment (GTAA) Update was prepared in 2016. Is this sufficiently up to date?
- Q5.38 Does the revised definition of Gypsies and Travellers in the Planning Policy for Traveller Sites (December 2023) affect the evidence or the requirement?
- Q5.39 Did the GTAA undertake a survey of persons who have ceased to travel permanently? If so, what is the need arising from this part of the community? If not, has this been undertaken as part of the

Strategic Housing Market Assessment (SHMA) and if so, what was the identified need?

- Q5.40 Can any additional need arising from those who have ceased to have travelled be met by the Local Plan?
- Q5.41 How were the needs of unknown households and transit provision considered?
- Q5.42 What was the response rate to the survey? Does this provide a sufficiently robust statistical basis for assessing need?
- Q5.43 Do the criteria set out at Policy HO10 provide an effective basis for the consideration of sites for Gypsies, Travellers and Travelling Showpeople?
- Q5.44 What is the relationship with the London Plan in terms of identifying accommodation needs for Gypsies and Travellers and is the Plan's policy approach in general conformity with the London Plan?
- Q5.45 Does the site allocated at 'Land at Pool Court' (LSA SA 8) meet the need for Gypsies, Travellers and Travelling Showpeople in full and provide a five-year supply of sites?
- Q5.46 In overall terms, is Policy HO10 justified, effective and consistent with national policy and in general conformity with the London Plan?

MATTER 6 – EMPLOYMENT AND RETAIL/TOWN CENTRE LAND REQUIREMENT

ISSUE – WHETHER THE LOCAL PLAN HAS BEEN POSITIVELY PREPARED AND WHETHER IT IS JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY AND IN GENERAL CONFORMITY WITH THE LONDON PLAN IN RELATION TO THE PROVISION FOR EMPLOYMENT AND RETAIL/TOWN CENTRE REQUIREMENTS.

Relevant Policies – Policies EC1, EC2

Employment Floorspace Requirement

- Q6.1 What specific evidence is available to support the employment floorspace requirement of 21,800m² (net) set out in Policy EC2 of the Local Plan? How has the employment floorspace requirement figure of 21,800m² (net) been arrived at? Are the assumptions made and data used in terms of employment forecasts and projections, demographic need and completion trends for past take-up rates still relevant and up to date?
- Q6.2 How does this evidence relate to the 2020 London Industrial Land Supply Study and the Lewisham Industrial Employment Land Report 2023 (EB22), and the update in Examination Document LC1?

- Q6.3 Who has the Council engaged with to understand both existing business needs and likely changes in the market? Is there a clear and sufficient understanding of the needs of the business community, including identifying and addressing barriers to investment?
- Q6.4 Policy EC2 sets out a forecast need for employment floorspace up to 2038. Should the policy address need which reflects the Plan period up to 2040?
- Q6.5 Policy EC2 does not break down the forecast need for additional employment floorspace by Use Class. Is this consistent with paragraph 6.2.1 of the London Plan which requires the provision of a sufficient supply of business space of different types, uses and sizes? What is the scale of the forecast need for respective B2, B8 and other industrial uses for the Local Plan period? Paragraph: 030 Reference ID: 2a-030-20190220 of the PPG provides guidance on translating employment and output forecasts into land requirements based on 4 key relationships, one of which is using standard industrial classification sectors to use classes. The Employment Land Report 2023 already breaks down the requirement into sectors so can this be translated into Use Classes?
- Q6.6 Does the Local Plan provide sufficient existing and new employment land in order to meet the requirement? Does the Plan provide sufficient flexibility?
- Q6.7 Overall, is the employment floorspace requirement in general conformity with the London Plan?

Employment Land Hierarchy

- Q6.8 How has the employment land hierarchy been derived?

Strategic Industrial Locations (SILs) (Policy EC5)

- Q6.9 How were SILs selected? Are they clearly defined in Policy EC2/EC5 and on the Policies map? Is it clear what uses will be permitted in these locations?
- Q6.10 What is the justification for re-designating 3 areas of Strategic Industrial Land (SIL) to Locally Significant Industrial Sites (LSIS)? Where is the evidence to support this approach?
- Q6.11 How was the proposed new SIL (and LSIS) at Bermondsey Dive Under (BDU) selected? What alternative options were considered? Does the BDU provide a suitable and adequate replacement for the 3 sites which are to be re-designated in terms of the quantity and quality of employment floorspace? Examination document LC6, paragraph 4.16 indicates that the Council is preparing further supplementary evidence to confirm the appropriateness of the BDU. Has this been progressed, and if so, will it be submitted to the Examination?

Local Significant Industrial Sites (LSIS) (Policy EC6)

Q6.12 How were LSIS selected? Are they clearly defined in Policy EC2/EC6 and on the Policies Map?

Q6.13 Is it clear what uses will be permitted on these sites?

Mixed Employment Use Locations (MEL) (Policy EC7)

Q6.14 How were MEL selected? Are they clearly defined in Policy EC2 and on the Policies Map?

Q6.15 Is it clear what uses will be permitted on these sites?

Non-designated employment sites (Policy EC8)

Q6.16 Is it clear where the non-designated employment sites are, and whether a proposal needs to meet this policy or not? Is the approach to development proposals outside of designated employment areas set out in Part C of Policy EC8 justified?

Class B8 storage or warehousing

Q6.17 Is the approach to Class B8 storage or warehousing set out in section Bd of Policy EC2 justified and consistent with the NPPF and in general conformity with the London Plan?

Retail/Town Centre Floorspace Requirement

Q6.18 What specific evidence is available to support the retail floorspace requirement of 8,400 m² (gross) up to 2035 set out in Policy EC12 of the Local Plan? Of this 8,400m² (gross), how much is comparison and convenience floorspace respectively?

Q6.19 Are the assumptions made and data used in terms of forecasts and projections, demographic need, and trends still relevant and up to date?

Q6.20 Policy EC12 sets out a forecast need for retail floorspace up to 2035. Should the policy address need which reflects the Plan period up to 2040?

Q6.21 How does the overall approach in Policies EC12 (to EC13) consider the evidence base which identifies an oversupply of retail floorspace for comparison goods?

Q6.22 How will proposals for the mixed-use redevelopment of town centre site allocations, including an element of residential, affect the supply of retail floorspace in the Borough?

Retail Hierarchy

Q6.23 How was the retail hierarchy set out at Policy EC12 derived? Is it in general conformity with the London Plan?

MATTER 7 TRANSPORT AND CONNECTIVITY

ISSUE – WHETHER THE LOCAL PLAN HAS BEEN POSITIVELY PREPARED AND WHETHER IT IS JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY AND IN GENERAL CONFORMITY WITH THE LONDON PLAN IN RELATION TO TRANSPORT AND CONNECTIVITY.

Sustainable Transport and Movement (*Policy TR1*)

- Q7.1 Are the schemes set out in Table 12.1 and any necessary land, buildings, space and supporting infrastructure shown on the Policies Map as safeguarded?
- Q7.2 Does criterion C of Policy TR1 sufficiently distinguish between safeguarding land in policy terms and the formal safeguarding directions made by the Secretary of State for Transport on 1 March 2021 with regard to the Bakerloo Line Extension?
- Q7.3 Would the policy be effective in encouraging a modal shift to more sustainable transport modes?

Bakerloo Line Extension (*Policy TR2*)

- Q7.4 What is the most up to date estimate of the likely timing and phasing of the Bakerloo Line Extension? Where is the evidence to support this estimate?
- Q7.5 Is the route or part of the route of the Bakerloo Line Extension and land for the proposed stations formally safeguarded via a Ministerial Safeguarding Direction? If so, is the safeguarded area clearly shown on the Policies Map? Is the remainder of the route/land not formally safeguarded clearly shown on the Policies Map? Is the distinction between land which is formally safeguarded, and land safeguarded in policy terms clear? Is there, or should there be a difference in the approach in these areas?
- Q7.6 Is the threshold of 400m in part C justified?
- Q7.7 What mechanisms will the Council utilise to ensure that development on sites in proximity to existing, planned or potential future Bakerloo Line stations is appropriately phased in order to secure the most beneficial use of land?
- Q7.8 Overall, is the Policy justified, effective and consistent with national policy and in general conformity with the London Plan?
- Q7.9 Are any modifications necessary for soundness?

Healthy Streets as part of healthy neighbourhoods

- Q7.10 Does Policy TR3 add anything to Policy T2 'Healthy Streets' of the London Plan? Is it locally specific?

- Q7.11 Will Policy TR3 encourage the desired modal shift to more sustainable modes of transport?
- Q7.12 Does Policy TR3 provide sufficient guidance to developers in terms of healthy streets?
- Q7.13 Overall, is Policy TR3 justified, effective and consistent with national policy and in general conformity with the London Plan?
- Q7.14 Are any modifications necessary for soundness?

Parking (*Policy TR4*)

- Q7.15 Is Part B of the Policy clear in terms of where car-free development will be supported?
- Q7.16 Is the requirement for a minimum of 20 % of total car parking spaces to have charging points for electric or Ultra-Low Emission vehicles, with passive provision for all remaining spaces, justified by the evidence. Has this requirement been considered in the whole plan viability assessment?
- Q7.17 Do all of the criteria under part B apply for proposals for car-free development?
- Q7.18 Does Policy TR4 give sufficiently clear guidance to developers?
- Q7.19 Overall, is Policy TR4 justified, effective and consistent with national policy and in general conformity with the London Plan?
- Q7.20 Are any modifications necessary for soundness?

Deliveries, servicing, and construction (*Policy TR5*)

- Q7.21 Does Policy TR5 give sufficiently clear guidance to developers?
- Q7.22 Overall, is Policy TR5 justified, effective and consistent with national policy and in general conformity with the London Plan?
- Q7.23 Are any modifications necessary for soundness?

Taxis and private hire vehicles (*Policy TR6*)

- Q7.24 Does Policy TR6 give sufficiently clear guidance to developers?
- Q7.25 Overall, is Policy TR6 justified, effective and consistent with national policy and in general conformity with the London Plan?
- Q7.26 Are any modifications necessary for soundness?

Digital Connectivity (*Policy TR7*)

- Q7.27 Does Policy TR6 give sufficiently clear guidance to developers?
- Q7.28 Overall, is Policy TR6 justified, effective and consistent with national policy and in general conformity with the London Plan?

Q7.29 Are any modifications necessary for soundness?

MATTER 8 – ECONOMY, TOWN CENTRES AND CULTURE POLICIES

Issue – Whether the Plan is positively prepared, justified, effective consistent with national policy, and in general conformity with the London Plan in relation to economy, town centres and culture.

General

Q8.1 Does the chapter title of 'economy and culture' sufficiently assist plan users in understanding that the chapter covers other aspects including town centres, retail activities and visitor accommodation?

A thriving and inclusive local economy (Policy EC1)

Q8.2 How would this policy actually be used in decision-taking?

Q8.3 Criterion Ac. refers to safeguarding industrial land, what is classified as industrial land? How exactly is it safeguarded? Is there sufficient flexibility for changing circumstances?

Q8.4 Are any modifications necessary for soundness?

Protecting employment land and delivering new workspace (Policy EC2)

Q8.5 Is the policy sufficiently flexible to cater for employment uses that maybe beyond the classes referred to in criterion (a) and what falls within the term 'related sui generis uses'?

Q8.6 How consistent is this policy with permitted development rights?

Q8.7 Is it appropriate for a policy to set out the suggestion in criterion (d) that planning conditions will be used on a blanket basis to control further changes of use? Would this approach interfere with the permitted development rights ?

Q8.8 Is the policy in general conformity with the London Plan, and are any differences adequately evidenced?

Q8.9 Are any modifications necessary for soundness?

High quality employment areas and workspace (Policy EC3)

Q8.10 Criterion A refers to 'Class E business' – is this anticipated to cater for everything under Class E? and what are the related sui generis uses?

Q8.11 Criterion B -where is the justification for the 2,500 square metres threshold? Is the policy justified in its approach to provide the flexible workspace or smaller units and consistent with the London Plan?

Q8.12 Criterion C - is the approach to only support live-work units within the specified areas justified?

Q8.13 Overall, is the policy sufficiently flexible, achievable, and deliverable?

Q8.14 Are any modifications necessary for soundness?

Low-cost and affordable workspace (Policy EC4)

Q8.15 Does the policy sufficiently address the issue of viability?

Q8.16 Is the policy sufficiently justified by evidence? Should the policy apply universally across Lewisham, or it be targeted to towards specific sites, locations, or allocations?

Q8.17 Is the policy justified in approaching all potential employment uses in the same way? Are the 10% and 50% figures justified by robust evidence?

Q8.18 Criterion B- is the approach likely to result in unintended consequences, such as discouraging investment in existing low-cost workspaces?

Q8.19 National policy in paragraph 64 supports the re-use of brownfield land where vacant buildings are being reused or developed. It allows for an affordable housing contribution to be reduced by an equivalent to the existing gross floor space of the existing buildings in most cases. Policy EC4 does not look to positively support the re-use of redevelopment of vacant buildings for employment use in the same way. Is this an issue that the policy should consider?

Q8.20 Does the policy provide sufficient certainty as to the period over which affordable workspace will be secured?

Q8.21 Overall, is Policy EC4 positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?

Q8.22 Are any modifications necessary for soundness?

Strategic Industrial Locations (SIL) (Policy EC5)

Q8.23 Criterion A refers to the London Plan. Is there a cross reference to a specific policy of the London Plan which could be included? Or can uses be specified? Is this criterion necessary or is it merely duplicating the London Plan?

Q8.24 How is the criterion B effective and will provide sufficient certainty for plan users regarding how it will be implemented?

Q8.25 Is criterion C necessary, or does it duplicate the London Plan? Is it sufficiently clear to be effective and enable people to understand what business activities and uses would support the function of London's Central Activities Zone?

Q8.26 Is the policy in general conformity with the London Plan, with regard to SIL locations and are any differences demonstrably justified by local evidence?

Q8.27 Are any modifications necessary for soundness?

Locally Significant Industrial Sites (LSIS) (Policy EC6)

Q8.28 Is criterion B effective and does it provide sufficient certainty for plan users regarding how it will be implemented?

Q8.29 Do criteria A and C provide contradictory requirements? Is criterion C justified by appropriate evidence and consistent with the London Plan?

Q8.30 What is meant by 'large format storage and warehousing uses and facilities' in criterion C?

Q8.31 Criterion D (c) refers to Childers Street North, whereas Table 8.1 in Policy EC2 refers to the Childers Street West, which is correct?

Q8.32 Criterion D (g) refers to Manor Lane (Part), how do any plan users know from this policy which part of the Manor Lane LSIS this is referring to and therefore be effective in practice?

Q8.33 Policy EC2 lists a total of 16 LSIS, whereas criterion D of Policy EC6 identifies 12 of the 16 as being suitable for the co-location of employment and other compatible uses. How have the 12 been chosen for this criterion? Is it justified by evidence? Is the potential for co-location of non-employment uses consistent with their role of LSIS and the role that they are intended to play in the employment land hierarchy?

Q8.34 What types of uses are anticipated to fall within the scope of 'other compatible uses' in criterion D?

Q8.35 What is the difference between the possibility of other compatible uses being allowed on 12 of the 16 LSIS and the category of Mixed-Use Employment Locations?

Q8.36 In criterion E, are all of the requirements in (a) – (d) intended to be met and if so, is that justified and effective?

Q8.37 Is the policy's approach towards uses within Class E(g) consistent with the London Plan; and national policy which refers to offices being within the definition of main town centre uses and the sequential approach envisaged within chapter 7 of the NPPF?

Q8.38 Overall, is Policy EC6 positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?

Q3.39 Are any modifications necessary for soundness?

Mixed-use employment locations (MEL) (Policy EC7)

- Q8.40 Is the policy's approach towards uses within Class E(g) consistent with the London Plan; and national policy which refers to offices being within the definition of main town centre uses and the sequential approach envisaged within chapter 7 of the NPPF?
- Q8.41 Is the policy approach the most effective way of achieving the comprehensive redevelopment ambitions for these locations or would an alternative strategy such as allocations or individual criterion for the locations be more locally distinctive and effective?
- Q8.42 Is sufficient evidence available to justify these locations being protected as employment land within the hierarchy? Is this approach consistent with the mixed-use focus of Policy EC7?
- Q8.43 Is the policy sufficiently flexible to cater for changing needs, particularly in the context of paragraph 122 of the NPPF?
- Q8.44 Will this policy create any conflict with permitted development rights?
- Q8.45 Are any modifications necessary for soundness?

Non-designated employment sites (Policy EC8)

- Q8.46 Is Policy EC8 positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?
- Q8.47 Given that the policy applies to a single category in the employment land hierarchy, what is the justification for then sub-dividing these non-designated sites into two categories under criteria B and C?
- Q8.48 What is the justification for the minimum period of 24 months marketing requirements in criterion C (e)?
- Q8.49 Are any modifications necessary for soundness?

Railway arches (Policy EC9)

- Q8.50 Why is this policy necessary given that railway arches would already be within the remit of other sites or locations in the employment land hierarchy?
- Q8.51 Is the reference in criterion B to some railway arches providing low-cost and affordable workspace justified? Would any railway arches that may happen to already be providing low-cost and affordable workspace not already be effectively addressed through Policy EC4?
- Q8.52 Is Policy EC9 positively prepared and justified in relation to the uses that will be supported in railway arches?
- Q8.53 Is the approach in criterion C that seeks to improve accessibility realistic, appropriate, and justified?

Q8.54 Is criterion E justified? And how does this sit with the consultation requirements set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended)?

Q8.55 Are any modifications necessary for soundness?

Workplace training and job opportunities (*Policy EC10*)

Q8.56 Criteria C and D suggest that financial contributions will be secured by conditions or planning contributions. Does this reflect the advice in Planning Practice Guidance on the use of planning conditions?

Q8.57 Criterion C refers to the Council's local labour scheme, what is this and how does it operate?

Q8.58 Is Policy EC10 positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan.

Q8.59 Are any modifications necessary for soundness?

General

Q8.60 A number of policies use the terms "active frontage", and "positive frontage" does the plan as a whole adequately explain what is meant by these terms? Are any modifications necessary for soundness?

Town centres at the heart of our communities (*Policy EC11*)

Q8.61 Is Policy EC11 justified, effective and consistent with national policy and in general conformity with the London Plan?

Q8.62 Are any modifications necessary for soundness?

Town centre network and hierarchy (*Policy EC12*)

Q8.63 How is criterion C consistent with national policy in Chapter 7 of the NPPF? Are there any local circumstances which justify the approach or other changes necessary to make the policy effective?

Q8.64 Is the threshold of 500 square metres gross floor space in criterion E a proportionate, locally set floorspace threshold, that is justified by evidence? Why is a lower threshold appropriate for Lewisham?

Q8.65 Should the Policy distinguish between A1 retail uses and other 'town centre' uses in terms of the sequential approach set out in the NPPF Glossary?

Q8.66 How does the overall approach in Policies EC12 to EC16 consider the evidence base which identifies an oversupply of retail floorspace for comparison goods?

Q8.67 Is criterion F sufficiently precise by what it means for new major Use Class E (a) retail development?

Q8.68 Are any modifications necessary for soundness?

Optimising the use of town centre land and floorspace (*Policy EC13*)

- Q8.69 How is Policy EC13 consistent with paragraph 86 of the NPPF and specifically criterion a which seeks to allow town centres to grow and diversify in a way that can respond to rapid changes and allow a suitable mix of uses?
- Q8.70 Criterion D refers to 'commercial unit', where is this defined?
- Q8.71 Are any modifications necessary for soundness?

Major and district centres (*Policy EC14*)

- Q8.72 Is the target of 50% retail uses in Lewisham Major Centre justified by evidence? What is indicated by the latest town centre surveys referred to in paragraph 8.81?
- Q8.73 Are the primary shopping areas (PSAs) clearly defined on the Policies Map and justified by appropriate and up to date evidence?
- Q8.74 Is the approach towards PSAs consistent with the permitted development rights within Use Class E, and are the additional restrictions justified by local evidence?
- Q8.75 How will the policy approach to PSAs be effective, having regard to the permitted development rights associated with Class E?
- Q8.76 Is criterion C in relation to a Shopping Area Impact Statement consistent with national policy?
- Q8.77 Should criterion D be clear in that the reference to 'retail' is Class E(a)?
- Q8.78 Is the policy approach set out in criterion E of Policy EC14 consistent with the introduction of Use Class E, which seeks to provide a more flexible approach to town centre uses?
- Q8.79 Why is criterion F (a) necessary given that it only refers to Policy EC17, and in any event the Plan should be read as a whole?
- Q8.80 Is criterion G with regard to residential uses justified and consistent with paragraph 86 of the NPPF?
- Q8.81 Are any modifications necessary for soundness?

Local centres (*Policy EC15*)

- Q8.82 Is the approach set out in criterion D of the policy consistent with the more flexible approach to town centre uses within section 7 of the NPPF?
- Q8.83 Is the policy approach set out in criterion F consistent with the introduction of Use Class E, which seeks to provide a more flexible approach to town centre uses?

Q8.84 Is criterion E with regard to residential uses justified and consistent with paragraph 86 of the NPPF?

Q8.85 Are any modifications necessary for soundness?

Shopping parades, corner shops and other service points (*Policy EC16*)

Q8.86 Is this policy consistent with classification of the hierarchy in Policy EC12 which only refers to shopping parades?

Q8.87 Is the policy consistent with the Use Classes Order in particular recognising and explaining how local shops can either be within Class E or Class F(2)? Are there any instances of where Class F(2) would apply within Lewisham?

Q8.88 Criterion D refers to Class E(g) with respect to retail uses, is it correct?

Q8.89 Are any modifications necessary for soundness?

Concentration of uses (*Policy EC17*)

Q8.90 On what basis have the uses in criterion A been selected? Is there local evidence to demonstrate that a concentration of such uses could result in harm?

Q8.91 Is the 400-metre radius in criterion B justified by evidence? Will it result in the policy being effective?

Q8.92 Is the approach to hot food takeaways consistent with national policy and are the thresholds appropriate and justified by adequate local evidence?

Q8.93 Does Policy EC17 effectively amount to a blanket ban on restaurants with an element of hot food takeaway within 400 metres of a school? How would a plan user know whether or not a site would be within 400 metres of the boundary of a proposed school to ensure this policy was effective?

Q8.94 Is the section in the policy on food and drink services appropriate, given that criterion E and F do not appear to relate to the heading of concentration of uses. Criterion E cross refers to Policy QD7, is this cross reference necessary? What is the Healthier Catering Commitment Standard? Is criterion F consistent with national policy?

Q8.95 Is it still appropriate to refer to Use Class A5 in Table 8.5?

Q8.96 Are any modifications necessary for soundness?

Culture, creative industries, and the night-time economy (*Policy EC18*)

Q8.97 Criterion C cross references to Policy EC18 (public houses). Is this necessary? If so, is a consequential amendment to Policy EC19 also necessary?

- Q8.98 Does the policy set out a robust approach for managing proposals for the night-time economy? How would potential conflicts with adjoining uses be addressed, for example residential?
- Q8.99 Is Policy EC18 sufficiently clear to be effective with regard to meanwhile uses, both in relation to their support and potential loss?
- Q8.100 Are any modifications necessary for soundness?

Public houses (*Policy EC19*)

- Q8.101 Is Policy EC19 justified and how will it be implemented in practice?
- Q8.102 Is Policy EC19 in general conformity with the London Plan in respect of the marketing period?
- Q8.103 The explanatory text in paragraph 8.109 refers to the need to evidence past patronage levels. Is such information actually likely to be recorded and available? Is this necessary to make the policy effective?
- Q8.104 Does criterion C provide sufficient flexibility to cater for changing circumstances across the Plan period and to provide an effective approach towards mixed-use development that could potentially help to secure public house provision?
- Q8.105 Appendix 5 sets out further information on proposals for public houses. What weight would this appendix have in decision-taking? Should the Policy include a cross reference to Appendix 5? How have the initiatives or proposals which would be needed in a viability statement, identified under Appendix 5 criterion 2 been derived? Would a proposal need to have explored all or some of these initiatives, and if only some, how many? How would this list be used in practice? The marketing statement requires evidence of marketing for at least 36 months whereas the criterion A b. requires a continuous period of three-years; should the wording be the same for consistency?
- Q8.106 Are any modifications necessary for soundness?

Markets (*Policy EC20*)

- Q8.107 Criterion B e. indicates new markets or market space outside of centres will only being permissible if they are temporary in nature, can this be justified?
- Q8.108 Are any modifications necessary for soundness?

Visitor accommodation (*Policy EC21*)

- Q8.109 Criterion B g. suggests an agreement needs to be in place to secure an operator prior to the commencement of development. Is such an approach justified? Would it be effective? Does it provide sufficient

flexibility to cater for the full range of serviced visitor accommodation including very small-scale proposals?

- Q8.110 What contribution would this policy make towards the London Plan's estimated requirement for additional bedrooms of serviced accommodation? How would monitoring of this policy measure success against the London Plan requirement?
- Q8.111 Is it appropriate in criterion C to require active ground floor frontages and for ancillary uses and facilities to be made available for public use where they are provided?
- Q8.112 Is criterion E justified given the legislative provisions that already exist within London?
- Q8.113 Are any modifications necessary for soundness?

MATTER 9 – HOUSING POLICIES

ISSUE – Whether the Plan has been positively prepared and whether it is justified, effective, consistent with National Policy, and in general conformity with the London Plan in relation to housing policies?

Relevant policies – Policies HO2; HO4

Optimising the use of small housing sites (Policy HO2)

- Q9.1 Should the small sites target set out at paragraph 7.14 of the Plan be included in Policy HO2 rather than the supporting text? Is it consistent with the London Plan target?
- Q9.2 Is the approach to housing conversions at HO2 E appropriate and justified? Is the threshold of 130m² justified and supported by evidence?
- Q9.3 In overall terms, is Policy HO10 justified, effective and consistent with national policy and in general conformity with the London Plan?
- Q9.4 Are any modifications necessary for soundness?

Housing Estate maintenance, renewal, and regeneration (Policy HO4)

- Q9.5 Is the approach to housing estate maintenance, renewal and regeneration set out in Policy HO4 appropriate and justified by the evidence?
- Q9.6 Is it appropriate to require compliance with the Decent Homes Standard in the Policy?
- Q9.7 In overall terms, is Policy HO4 justified, effective and consistent with national policy and in general conformity with the London Plan?
- Q9.8 Are any modifications necessary for soundness?

MATTER 10 - HIGH QUALITY DESIGN AND HERITAGE

ISSUE – Whether the Plan has been positively prepared and whether it is justified, effective, consistent with National Policy, and in general conformity with the London Plan in relation to creating high quality places and preserving or enhancing the Borough’s heritage.

Chapter 5 General

Q10.1 Is the overall level of detail appropriate to the Local Plan, or would some of the content be more appropriate for a design guide and/or supplementary guidance?

Delivering high quality design in Lewisham (Policy QD1)

Q10.2 Is criterion J b. seeking to mandate pre-application advice? What happens if the feedback is negative? Is it appropriate for inclusion in the policy or would it be better located in the supporting explanatory text? Would development proposals be specifically refused on criterion J b.?

Q10.3 Is criterion K seeking to mandate community engagement beyond the legal requirement? Is there some form of threshold or measure? Is it appropriate to consider proposals more favourably if they have undertaken early community/stakeholder engagement? What if the feedback is negative? Does the approach comply with legal requirements for pre-application consultation and the NPPF? As a procedural matter, would this be better located in supporting explanatory text?

Q10.4 What types of applications or developments go to the Design Review Panel?

Q10.5 How does paragraph 5.5 relate to the National Design Guide? Are there any local design guides, existing or planned to help users? What When is the ‘package’ of planning guidance likely to be forthcoming?

Q10.6 Should there be reference to the National Design Guide in the policy and how it will be used in decision-taking? Are the topics in criterion C drawn from the National Design Guide?

Q10.7 Criterion E c. contains reference to ‘positive’ and ‘active’ frontages. Is there is a difference between these terms in Lewisham?

Q10.8 Does the policy give sufficient focus on the role of greening of the environment with trees, landscaping and other interventions beyond those referenced in criterion C a.?

Q10.9 Is the policy sufficiently flexible to cater for all proposals coming forward, such as constrained sites or a single building development?

Q10.10 Is the intention behind Policy QD1 to be an overarching policy from which a number of other will then follow on? If so, would it be necessary or appropriate to cross refer to the other related policies?

Q10.11 Are any modifications necessary for soundness?

Inclusive and safe design (*Policy QD2*)

Q10.12 How does the requirement for 'inclusive design statement' sit against the legal requirement for a design and access statement in the first instance? Would a design and access statement cover this anyway? It could be perceived as another separate document which is potentially duplicating information? How much development does the Council receive where a design and access statement is not required?

Q10.13 What is the evidence and justification for the requirements in criterion D?

Q10.14 Is the policy sufficiently flexible on the matter of accessible housing to consider all circumstances (for example conversion of listed building where a lift might be unacceptable or impractical)?

Q10.15 Are any modifications necessary for soundness?

Public realm and connecting places (*Policy QD3*)

Q10.16 Should the cycle parking in criterion D b. be secure cycle parking? How would this affect the public realm?

Q10.17 Would criterion F be effective in that how would an applicant know whether these should be included or not? Would there be a need to consider the scale of public realm when assessing proposals?

Q10.18 Would criterion H be effective? How would an applicant know whether they should provide public art or not?

Q10.19 Are any modifications necessary for soundness?

Building heights (*Policy QD4*)

Q10.20 Is the evidence sufficiently robust for the suitability zones chosen and for the relevant heights set out in the various zones?

Q10.21 What is the justification for criterion D b. requiring that the tall building would need to be exceptional whereas it is high quality for everything else?

Q10.22 In Figure 5.1 the appropriate locations for tall buildings are defined with a mustard-coloured boundary. What is the justification for an area within North Deptford which is suggested to be appropriate, yet the shading is very light green and indicates less suitable?

Q10.23 Would it be more effective and appropriate to annotate Figure 5.1 to indicate which area is which as per the locations listed in Policy QD4?

- Q10.24 Criterion D c. references Figure 5.2. How does this relate to the tall buildings' suitability zones? As an example, Catford and Blythe Hill appear to be appropriate but are also in a more sensitive location?
- Q10.25 What is the rationale and justification for identifying an area of Bell Green and another in Lower Sydenham as appropriate locations for tall buildings?
- Q10.26 Is the policy compatible with the overall spatial strategy?
- Q10.27 Are there any areas outside of the suitability zones identified where there could be existing tall buildings already whose replacement or additions to or extra buildings within a group, could be excluded by the policy?
- Q10.28 Is the policy in general conformity with the London Plan?
- Q10.29 Are any modifications necessary for soundness?

View management

- Q10.30 Are all of the views justified by evidence? How have the local views been determined? What criteria were used?
- Q10.31 Policy QD5 refers to 'strategic views', 'local views' 'protected vistas' and 'local landmarks', should the policy include a cross reference to Figure 5.11? The legend for Figure 5.11 refers to other aspects, where is the explanation for these; including workshop views, wider setting consultation area and extended view corridors? How does it relate to the policy text, and should they be internally consistent?
- Q10.32 Is the policy consistent with the London Plan?
- Q10.33 Several representations have suggested omissions of Local Landmarks from Schedule 1? Have these been assessed?
- Q10.34 Are any modifications necessary for soundness?

Optimising site capacity (Policy QD6)

- Q10.35 Is the approach to optimising site capacity justified, effective, consistent with National Policy and in general conformity with the London Plan?
- Q10.36 Are any modifications necessary for soundness?

Amenity and agent of change (Policy QD7)

- Q10.37 Criterion B appears to duplicate the requirement of the London Plan, why is it required?
- Q10.38 Does criterion C e. only seek to protect existing green and open spaces that are already tranquil and quiet?

- Q10.39 Can criterion C f. be justified? How does the Council envisage development would prejudice the use of playing fields?
- Q10.40 Is the sub-heading of 'energy efficient' relevant when criterion F and G relate to lighting which follows on from criterion E.
- Q10.41 Are any modifications necessary for soundness?

High quality housing design (Policy QD8)

- Q10.42 Criteria B and C appear to duplicate the London Plan, why are they necessary in the policy? Could a cross reference in the supporting text be sufficient?
- Q10.43 What is the relationship between Policy QD8 and the Nationally Described Space Standards?
- Q10.44 Is the policy sufficiently flexible to take account of site-specific circumstances and requirements?
- Q10.45 Is criterion G requiring the provision of dual aspect dwellings necessary and sufficiently flexible to cater for all circumstances? Is it consistent with the London Plan?
- Q10.46 How does criterion E relate to the daylight and sunlight guidance in the Mayor's Housing SPG (2016)?
- Q10.47 Are any modifications necessary for soundness?

Building alterations, extensions, and basement development (Policy QD9)

- Q10.48 Is criterion C justified and could it stifle innovative and contemporary design including where such design might be seeking to positively address the impacts of climate change?
- Q10.49 Would criterion D create conflict with permitted development rights for upward extensions?
- Q10.50 What is the justification in criterion E for the retention of 50% of the original garden area?
- Q10.51 Criterion F refers to amenity space, how does this relate to Policy QD8? given that the standards in Policy QD8 relate to all housing proposals and therefore alterations or extensions?
- Q10.52 Could criterion H be re-drafted to be more positively written?
- Q10.53 Is criterion K necessary to be included within the Local Plan?
- Q10.54 Are any modifications necessary for soundness?

Infill and backland sites, garden land and amenity areas (Policy QD10)

- Q10.55 Could Policy QD10 be more positively worded?

- Q10.56 Are the sub-criterion in A and B necessary or are they duplicating more general criteria found elsewhere in the Plan?
- Q10.57 Is the overall approach justified, is it consistent with the requirement in paragraph 69a. of the NPPF to accommodate at least 10% of housing on sites of no larger than 1 hectare?
- Q10.58 Is the policy consistent with the small sites component of the housing requirements in the London Plan?
- Q10.59 Is the policy approach consistent with paragraph 71 of the NPPF?
- Q10.60 How does this policy relate to the requirements of Policy QD6 seeking to optimise site capacity?
- Q10.61 Are any modifications necessary for soundness?

Shopfronts (*Policy QD11*)

- Q10.62 With reference to explanatory text paragraph 5.89, is this policy sufficiently flexible to deal with shopfronts in both traditional and modern settings?

Outdoor advertisement, digital displays, and hoardings (*Policy QD12*)

- Q10.63 Is this policy justified, effective and consistent with the NPPF (July 21), paragraph 136? Would it be effective given the separate consent system for the control of advertisements?
- Q10.64 Are any main modifications necessary for soundness?

MATTER 11 – HISTORIC ENVIRONMENT

Lewisham’s historic environment (*Policy HE1*)

- Q11.1 Is the issue of archaeology adequately covered in this policy? Is it sufficiently clear to be effective?
- Q11.2 Is criterion B effective; specifically in terms of whether someone reading the plan will know what is meant by historic environment and understand what, in planning terms, is referred to as a heritage asset?
- Q11.3 Criterion B refers to heritage assets in the general sense, but specifically refers to the public benefit. Is this necessary within this policy? If so, to be consistent with the NPPF the policy should be clear that the public benefits test is only required for designated heritage assets with a cross reference to Policy HE2?
- Q11.4 Is criterion D seeking to address enabling development? If so, is it consistent with paragraph 208 of the NPPF?
- Q11.5 Overall, is Policy HE1 justified, effective, consistent with National Policy and in general conformity with the London Plan?

Q11.6 Are any modifications necessary for soundness?

Designated Heritage Assets (*Policy HE2*)

Q11.7 Should the approach to Conservation Areas refer to the public benefits test as set out in paragraph 202 of the NPPF?

Q11.8 London Squares arise from the London Squares Preservation Act 1931. Is there evidence of any assessment as to whether those within the Borough meet the requirements of the Act?

Q11.9 Is all of the World Heritage Site buffer zone within Lewisham illustrated? and is it consistent with the latest version of the Maritime Greenwich World Heritage Site Management Plan?

Q11.10 Are any modifications necessary for soundness?

Non-designated heritage assets (*Policy HE3*)

Q11.11 Is the overall approach to non-designated heritage assets (NDHA) consistent with the NPPF, in particular with the requirement for taking a balanced judgement, which is set out under paragraph 203?

Q11.12 Is there a list of locally listed buildings of architectural or historic interest? Should the Plan provide a signpost to where someone reading the Plan would find the list?

Q11.13 What criteria have been used to select the NDHA? Has it been subject to any public consultation? What review mechanism exists for the selection criteria and the list of NDHA themselves?

Q11.14 What is an Area of Special Local Character? How have they been defined?

Q11.15 Are there any character appraisals or other evidence which identifies the characteristics and significance to allow criterion D to be effective in practice?

Q11.16 In relation to archaeology, are there any NDHAs of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments as set out in footnote 68 to paragraph 203 of the NPPF? If so, should these be clearly identified so that a balanced judgement and policy consideration can be taken?

Q11.17 Should Figure 6.2 illustrating the non-designated heritage assets include registered parks and gardens when they are designated heritage assets?

Q11.18 Are any modifications necessary for soundness?

MATTER 12 – COMMUNITY INFRASTRUCTURE

ISSUE 1 – Does the Plan set out an appropriate strategy to secure sufficient community infrastructure to cater for the growth proposed across the Borough?

Relevant policies: Policies CI1; CI2; CI3; CI4; CI5

General

Q12.1 Is the terminology of 'community infrastructure' in general conformity with the London Plan? Or should it refer to 'social and community infrastructure'?

Safeguarding and securing community infrastructure (Policy CI1)

Q12.2 Does the policy provide sufficient certainty to developers and plan users as to the level and type of community infrastructure which may need to be provided as part of new developments?

Q12.3 Is it clear as to when either, on-site provision of a contribution or off-site provision would be required? How would contributions be calculated?

Q12.4 In part D is it clear as to how payment in-lieu contributions would be calculated? Should there be a cross reference to where an applicant would find the formula for calculating such payments?

Q12.5 Is criterion C effective? In particular, is it justified to treat community facilities that may be part of the public estate differently to those facilities which may be run by other groups and organisations.

Q12.6 How would Policy CI1 consider 'meanwhile', and 'temporary' community uses?

Q12.7 Overall, is Policy CI1 justified, effective and consistent with the NPPF and in general conformity with the London Plan?

Q12.8 Are any modifications necessary for soundness?

High quality community infrastructure (Policy CI2)

Q12.9 Could criterion A have unintended consequences? For example, if an existing community facility is not easily accessible by public transport at present, would proposals for its alteration, extension or reconfiguration be resisted under criterion A b.?

Q12.10 Is criterion C justified and effective?

Q12.11 Overall, is Policy CI2 justified, effective and consistent with the NPPF and in general conformity with the London Plan?

Q12.12 Are any modifications necessary for soundness?

Sports, recreation, and play (*Policy CI3*)

- Q12.13 What is the evidence for sports and recreation facilities and play and informal recreation? Is it up to date? What does it show?
- Q12.14 How would development proposals which would generate additional demand for sports and recreation facilities, particularly in an area of deficiency be assessed? Would development be expected to provide new facilities or contribute to the improvement of existing facilities either on or off-site?
- Q12.15 Are criterion C and D clear in terms of when new housing would be expected to make either on/off-site provision or contribute to the improvement of existing facilities?
- Q12.16 What is the basis for the formal play provision standard of at least 10m² per child?
- Q12.17 What is the basis for the formula for calculating payments in lieu set out in Table 9.1? Would this be better located in the supporting text?
- Q12.18 How would the amount of informal recreation space be determined? Is there a relevant standard?
- Q12.19 What is meant by 'communal amenity' space at criterion E g.? Is there a relevant standard for this?
- Q12.20 Is criterion E g. justified and would it be effective in securing development at appropriate densities? Is it sufficiently flexible to cater for the types of development proposals envisaged to come forward across the Borough?
- Q12.21 How would the policy apply to housing proposals that were specifically designed for older or disabled persons? Is the policy sufficiently clear and does it provide sufficient flexibility to consider specialist forms of housing that may come forward?
- Q12.22 How are other types of open space provision addressed? For example, green infrastructure?
- Q12.23 Overall, is Policy CI3 justified, effective and consistent with the NPPF and in general conformity with the London Plan?
- Q12.24 Are any modifications necessary for soundness?

Nurseries and childcare facilities (*Policy CI4*)

- Q12.25 Does the Lewisham's Childcare Sufficiency Assessment from 2016 provide a suitable and up to date evidential baseline for this policy?
- Q12.26 Is Criterion B justified to resist residential floorspace being turned into nursery and childcare facilities? Does the criterion provide sufficient flexibility to cater for all circumstances?

Q12.27 Is Policy CI4 criterion A a. justified in requiring proposals for day nurseries and childcare facilities to be in locations easily accessed by public transport in addition to being easily accessed by walking and cycling?

Q12.28 Overall, is Policy CI4 justified, effective and consistent with national policy and in general conformity with the London Plan?

Q12.29 Are any modifications necessary for soundness?

Burial space (Policy CI5)

Q12.30 What is the evidence of need for burial space? Paragraph 9.24 refers to a local assessment being undertaken, what is the progress and what does it show?

Q12.31 Does criterion B need to be expanded to consider the impact on the overall water environment, not just flood risk?

Q12.32 Should criterion B also identify impact on archaeology as a relevant consideration?

Q12.33 Overall, is Policy CI5 justified, effective and consistent with national policy and the London Plan.

Q12.34 Are any modifications necessary for soundness?

MATTER 13 – GREEN INFRASTRUCTURE

ISSUE – Does the Plan set out an appropriate strategy to secure sufficient green infrastructure to cater for the growth proposed across the Borough and is it consistent with national policy and in general conformity with the London Plan?

Green infrastructure and Lewisham's Green Grid (Policy GR1)

Q13.1 Overall, is Policy GR1 justified, effective and consistent with national policy and in general conformity with the London Plan.

Q13.2 Are any modifications necessary for soundness?

Open space (also see Part 5, Schedule 7, Table 21.7) (Policy GR2)

Q13.3 What is the evidence base to inform the consideration of open space in the Local Plan? What does it show? Is it up to date?

Q13.4 Does Policy GR2 set out an appropriate strategy to address open space deficiency across the Borough?

Q13.5 Is there sufficient and clear visual illustration of the different types of open space to ensure the policy is effective?

Q13.6 Where is the term 'Strategic Open Space' defined? Strategic Open Space is indicated on the Policies Map, however none of the figures

within the Plan itself illustrates or refer to Strategic Open Space. Does Figure 10.2 (Open Spaces) represent all of the areas that collectively comprise the category of Strategic Open Spaces?

- Q13.7 Is the approach set out in relation to the loss of Strategic Open Space (Part C) consistent with national policy and in general conformity with the London Plan?
- Q13.8 Policy GR2 refers to neighbourhood open space. As Table 10.1 indicates that these are not identified on the Policies Map. Consequently, how does any plan user know what areas this part of the policy is intended to apply to?
- Q13.9 Is the categorisation of open space based on importance or scale, or a combination of both?
- Q13.10 Representations have been made in support and in objection to the de-designation of areas of Metropolitan Open Land, where is this explained in the Local Plan itself and is the approach justified?
- Q13.11 Are there any Local Green Space designations in the made Neighbourhood Plans and if so, should they be identified on the Policies Map?
- Q13.12 Where new development generates the need for the various typologies of new open space how would the Council secure this? Where is the approach which the Council would take set out?
- Q13.13 Are any modifications necessary for soundness?

Biodiversity and access to nature (*Policy GR3*)

- Q13.14 What is the current status of the Local Nature Strategy?
- Q13.15 Does criterion D need to include the words 'located outside of the Borough'?
- Q13.16 Paragraph 10.18 indicates that criterion E of the policy will be used as a guide until such time further legislation and national policy take effect. Are modifications necessary for the policy and explanatory text to recognise that the biodiversity net gain legislative provisions have commenced? Is it appropriate and justified by evidence for the policy to require a 'minimum' 10 % increase?
- Q13.17 Is criterion F necessary and appropriate for inclusion within a policy given that it largely refers to the validation and consultation parts of the development management process?
- Q13.18 How does the policy respond to 'irreplaceable habitats' as per paragraph 180 c) of NPPF?
- Q13.19 Are any modifications necessary for soundness?

Lewisham Links (*Policy GR4*)

Q13.20 To be effective, should Policy GR4 be accompanied by an associated figure(s) to illustrate the Lewisham Links? Although paragraph 10.22 says that further details are set out in Part 3 of the Local Plan for each of the Borough's character areas, there is no specific reference to the relevant figures. Consequently, it may not be immediately clear to someone reading the plan whether this policy is or is not relevant to a development proposal. Is this the case?

Q13.21 Are any modifications necessary for soundness?

Urban greening and trees (*Policy GR5*)

Q13.22 Does criterion C duplicate a matter already addressed by the London Plan?

Q13.23 How does the first sentence of criterion F meet the tests of soundness relating to being positively prepared, justified, and effective? Is the first sentence of criterion F and the text in paragraph 10.27 internally consistent?

Q13.24 Criterion F incorrectly refers to Tree Protection Order which should be amended to read Tree Preservation Order.

Q13.25 Are any modifications necessary for soundness?

Food growing (*Policy GR6*)

Q13.26 Is criterion B justified in terms of evidence relating to a requirement or need for provision of space for community gardening and food growing?

Q13.27 Does the first sentence of criterion B solely seek on-site provision? Would it allow for off-site provision or contributions?

Q13.28 Does the second sentence of criterion B duplicate the protection in criterion A?

Q13.29 As currently written; criterion B appears to relate to proposals for community facilities of any size. However, paragraph 10.35 appears to only relate to community uses that constitute major development. Is the policy, as written, effective and sufficiently flexible to cater for the wide range of community proposals that may come forward where provision of space for community gardening and food growing may not be appropriate or practical?

Q13.30 Are any modifications necessary for soundness?

Geodiversity (*Policy GR7*)

Q13.31 Whilst not a matter of soundness, could the useability of the plan be easier if readers are directed to any figure or plans (perhaps Policies Map) which illustrates the boundaries of the 3 sites.

Q13.32 Are any modifications necessary for soundness?

MATTER 14 – SUSTAINABLE DESIGN & INFRASTRUCTURE

ISSUE - Does the Plan set out an appropriate strategy to secure sustainable design and sufficient infrastructure to cater for the growth proposed across the Borough and is it consistent with national policy and in general conformity with the London Plan?

General

Q14.1 Are there any implications for the Plan or evidence base arising from the Written Ministerial Statement issued on 13 December 2023 regarding local energy efficiency standards? Are any potential modifications needed?

Q14.2 Does this chapter of the Plan reflect the requirements of the Planning and Energy Act 2008?

Q14.3 Is any aspect of this chapter duplicating any requirements under the Building Regulations or other regulatory regimes?

Responding to the climate emergency (Policy SD1)

Q14.4 What does 'help' mean in criterion Ba and Bf? Would a proposal be refused if it was not considered to 'help'? Is it effective? How would 'help' be measured?

Q14.5 Is Policy SD1 consistent with paragraph 153 of the NPPF?

Q14.6 Are any modifications necessary for soundness?

Sustainable design and retrofitting (Policy SD2)

Q14.7 Are the requirements to meet various standards and the thresholds used in the policy justified?

Q14.8 Is the policy sufficiently flexible to adequately address the varied nature of new development and existing property stock?

Q14.9 Is it appropriate for the policy to require compliance with BRE and BREEAM ratings?

Q14.10 How does the policy take into account development proposals where the end user or internal specification is not yet known?

Q14.11 Has the Viability Appraisal considered the requirements of this policy?

Q14.12 Are any modifications necessary for soundness?

Minimising greenhouse gas emissions (Policy SD3)

Q14.13 How would the cash-in-lieu contribution to the carbon offset fund be calculated?

Q14.14 Is the policy justified and effective in its approach and in general conformity with the London Plan?

Q14.15 Are any modifications necessary for soundness?

Energy infrastructure (*Policy SD4*)

Q14.16 Are criteria G and H justified?

Q14.17 How are Heat Priority Areas defined and are these shown on the Policies Map?

Managing heat risk (*Policy SD5*)

Q14.18 The issue of overheating is now addressed in the Building Regulations (Approved Document O). Consequently, is this policy necessary and can it be justified?

Q14.19 Are any modifications necessary for soundness?

Improving air quality (*Policy SD6*)

Q14.20 Footnote 116 refers to the Draft Lewisham Air Quality Management Plan. Has this progressed to a finalised form?

Q14.21 Criterion D requires compliance with 'Non-Road Mobile Machinery Low Emission Zone requirements' – what status does this have? Is it appropriate to require compliance with it?

Q14.22 Are any modifications necessary for soundness?

Minimising and managing flood risk (*Policy SD7*)

Q14.23 What is the evidence for flood risk in the Borough?

Q14.24 Is the approach set out in Policy SD7 justified, effective and consistent with national policy and in general conformity with the London Plan.

Q14.25 Are any modifications necessary for soundness?

Sustainable drainage (*Policy SD8*)

Q14.26 Is it appropriate for criterion C to refer to specific standards?

Q14.27 Is it appropriate for criterion D to refer to consultation with the Environment Agency as this is a matter of development management practice rather than plan making?

Q14.28 What is the justification for the additional criterion proposed in the modifications set out under reference MO66, Schedule of Modifications (PD11)? How do these relate to the provisions of the Building Regulations and other related legislation?

Lewisham's waterways (*Policy SD9*)

Q14.29 Criterion B is applicable to development sites that contain or are adjacent a main river, an ordinary watercourse, or other water space. Where would a plan user find a plan or details of these water features to know whether their site does or does not need to address this part of the policy?

Q14.30 Are any modifications necessary for soundness?

Water supply and wastewater (*Policy SD10*)

Q14.31 Is criterion B of the policy justified and effective?

Q14.32 What is the justification for an optional higher water standard? If so, should it be within the policy rather than the explanatory text?

Q14.33 Are any modifications necessary for soundness?

Ground conditions (*Policy SD11*)

Q14.34 Is the current policy title clearly written and unambiguous so that it is evident to a plan user that it also addresses hazardous substances?

Q14.35 Is there any known unstable land within Lewisham? If so, should the policy also set out a framework to address unstable land in accordance with 183a) of the NPPF?

Q14.36 Criterion D talks about proposals within the vicinity of a hazardous installation. Paragraph 11.74 says there are hazardous installations both within and within proximity to the Borough, including the Lower Sydenham Gas Holders. How does a plan user know whether or not their site is within the vicinity of a hazardous installation?

Q14.37 Are any modifications necessary for soundness?

Reducing and sustainably managing waste (*Policy SD12*)

Q14.38 Is criterion D and the preference for new waste management facilities to be located within a Strategic Industrial Location sufficiently flexible to cater for all types of waste proposals?

Q14.39 Is the policy in general conformity with the London Plan and consistent with National Planning Policy for Waste?

Q14.40 Are any modifications necessary for soundness?

Design to support the circular economy (*Policy SD13*)

Q14.41 Is criterion B in general conformity with the London Plan and is it sufficiently flexible to cater for development proposals where an end user is not yet known?

Q14.42 Are any modifications necessary for soundness?

MATTER 15 – HOUSING LAND SUPPLY

Relevant Policy: HO1

ISSUE – WHETHER THE PLAN WILL PROVIDE FOR A SUFFICIENT HOUSING LAND SUPPLY TO DELIVER THE PLANNED SCALE OF HOUSING GROWTH OVER THE PLAN PERIOD AND WHETHER A DELIVERABLE FIVE-YEAR SUPPLY OF HOUSING WILL BE AVAILABLE ON ADOPTION.

- Q15.1 Is the Plan consistent with the expectation of NPPF Paragraph 68 for planning policies to identify a sufficient supply of specific, deliverable sites for years 1-5 of the plan period and specific, developable sites or broad locations for growth for years 6-10 and where possible for years 11-15?
- Q15.2 Having regard to the Planning Practice Guidance, what is the estimated total supply of deliverable and developable new housing during the Plan period 2020-2040?
- Q15.3 What is the estimated supply from each of the following sources:
- a) Completions since 2020;
 - b) Sites with detailed planning permission for 10 or more dwellings;
 - c) Sites with outline or detailed planning permission for 9 or less dwellings (small sites);
 - d) Windfall allowance;
 - e) Other sites with outline planning permission for 10 or more dwellings;
 - f) Site allocations;
 - g) Sites on the brownfield register;
 - h) Other sources not included in a-g above.
- Q15.4 What evidence is there to support these estimates and are they justified?
- Q15.5 Is there compelling evidence to support the small site windfall allowance? How does it compare to the 'small sites' figure in Table 4.2 of the London Plan? How does it compare to previous rates of delivery on small sites?
- Q15.6 What is the requirement for the first five years following adoption of the Plan and should a 5% or 20% buffer be applied, given the HDT results?
- Q15.7 Can the submitted Local Plan specifically demonstrate a deliverable five-year supply of housing land at adoption and, if so, is there a reasonable prospect of this being maintained throughout the Plan period? In particular:

- Q15.8 Is it appropriate to account for previous under-delivery in the calculation of housing supply?
- Q15.9 Overall, would at least 10% of the housing requirement be accommodated on sites no larger than one hectare as set out in NPPF paragraph 69?
- Q15.10 How has flexibility been provided in terms of the housing land supply? Are there any other potential sources of supply not specifically identified? Can this be specified?
- Q15.11 What are the assumptions about the scale and timing of supply and annual rates of delivery for sources of supply set out in the housing trajectory in Appendix 6? Are the assumptions realistic compared to previous rates of delivery?
- Q15.12 Would the Local Plan realistically deliver the number of homes required over the Plan period?
- Q15.13 Is the approach to increasing housing supply set out at part C of Policy HO1 of the Plan justified? How does the Council propose to achieve a 'carefully managed uplift' in the delivery of new housing development across the Borough?
- Q15.14 Overall, is the Plan's approach to housing supply and the housing trajectory positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?
- Q15.15 Are any modifications necessary for soundness?

PART 3 – LEWISHAM’S NEIGHBOURHOODS AND PLACES

MATTER 16 - SITE SELECTION PROCESS AND METHODOLOGY

- Q16.1 Has the site selection process for allocations been based on a sound process of sustainability appraisal and testing of reasonable alternatives?
- Q16.2 Is the methodology set out in the Lewisham Site Allocations Background Paper 2023 (EB15) appropriate?
- Q16.3 Was an appropriate selection of potential sites assessed?
- Q16.4 Table 1 of EB15 sets out the screening criteria for potential development sites. How were these criteria determined? Was there any specific public consultation on the criteria?
- Q16.5 Are the reasons for selecting the preferred sites and rejecting others clear and justified?
- Q16.6 How have indicative site capacities been established?
- Q16.7 Is the approach of setting about housing capacity figures as a range in the South area justified? How will this be implemented in practice?
- Q16.8 How have the mix of uses been established for mixed-use sites? Are the assumptions set out at Table 3 of EB15 appropriate?
- Q16.9 How have small sites been dealt with?
- Q16.10 Are the assumptions underpinning the phasing of sites justified?
- Q16.11 Are all sites viable? How has viability been considered as part of the preparation of the Plan?
- Q16.12 How was the spatial distribution of housing allocations determined? Is the spatial distribution consistent with policies of the Local Plan and the London Plan?
- Q16.13 What is the relationship between the London Strategic Housing Land Availability Study (2017) and the Lewisham Site Allocations Background Paper 2023 (EB15).
- Q16.14 What is the difference between the 'development requirements' and the 'development guidelines' in the site allocation policies? Do they have equal status?

MATTER 17 - LEWISHAM'S CENTRAL AREA ALLOCATIONS

Issue - Whether the proposed Central Area allocations are justified, effective and consistent with national policy?

Relevant Policies: LCA1; LCA2; LCA3; LCA4; and Site allocations LCA SA 1-22

Vision and Key Spatial Objectives

Q17.1 Are the vision and spatial objectives justified, effective and consistent with national policy and in general conformity with the London Plan?

Policy LCA1 Central Area place principles

Q17.2 Are the Central Area place principles justified, effective and consistent with national policy and in general conformity with the London Plan.

Policy LCA2 Lewisham major centre and surrounds

Q17.3 Is the approach of seeking to secure Lewisham as a Metropolitan Centre of sub-regional significance in London justified by the evidence? Is it in general conformity with the London Plan?

Q17.4 How will the 'appropriate mix of main town centre uses at ground floor level' be determined/assessed?

Q17.5 Is the approach of transformational improvement of Lewisham Major Centre justified?

Q17.6 How was the Primary Shopping Area referred to in Part I defined? Is it clearly identified on the Policies Map? (is this matter covered elsewhere?)

Q17.7 Is part J of the Policy consistent with Policy EC8 with regards to potential reductions in employment floorspace? Does the Policy provide sufficient flexibility?

Q17.8 Overall, is Policy LCA2 justified, effective, consistent with national policy and in general conformity with the London Plan.

Policy LCA3 Catford major centre and surrounds

Q17.9 What status does the Catford Town Centre Framework have? Has it been subject to public consultation?

Q17.10 What is the timeframe for the realignment of the South Circular (A205) at Catford Major Centre? How will it be facilitated through the Local Plan?

Q17.11 How was the Primary Shopping Area identified? Is this clearly shown on the Policies Map?

Q17.12 How would an 'appropriate mix of main town centre uses' be determined? Where is this defined?

Q17.13 Is Part L of the policy consistent with Policy EC8 with regards to potential reductions in employment floorspace? Does the Policy provide sufficient flexibility?

Q17.14 Overall, is Policy LCA3 justified, effective, consistent with national policy and in general conformity with the London Plan.

Policy LCA4 A21 Corridor

Q17.15 Overall is Policy LCA4 justified, effective, consistent with national policy and in general conformity with the London Plan.

Site Allocations – Lewisham’s Central Area

NB In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations, for example in terms of adverse impacts, delivery and so on.

Taking each of the 22 proposed sites individually:

Q17.16 What is the background to the site allocation? How was it identified and which options were considered?

Q17.17 Are the site areas and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Q17.18 What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, pollution, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would the policy safeguards and proposed mitigation be sufficiently effective?

Q17.19 Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Q17.20 What effect will the allocations have on the highway network(s)? Where necessary, is it clear to decision-takers, developers, and local communities what the necessary highway improvements consist of, who will be responsible for delivering them and when?

Q17.21 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Q17.22 Is the development proposed viable and deliverable within the plan period?

Q17.23 If the site is already under construction, how much has been constructed to date?

Q17.24 What is the situation in relation to land ownership and developer interest?

- Q17.25 How is it intended to bring the site forward for development?
- Q17.26 What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?
- Q17.27 Is the expected timescale and rate of development realistic?
- Q17.28 Are any modifications necessary in the interests of soundness?

Further questions relating to specific allocations:

2. Lewisham Shopping Centre

- Q17.29 Has a masterplan been prepared for the site? If so, what status does it have?
- Q17.30 How were the proposed mix of uses determined? Is the approach to defining site capacities for each land use robust and realistic?
- Q17.31 Overall, would there be a net gain or loss of main town centre uses/commercial/employment/community uses?
- Q17.32 Will the proposed retail element achieve the identified retail floorspace requirement for Lewisham?
- Q17.33 Does the policy enable sufficient flexibility?
- Q17.34 Is the approach for the comprehensive redevelopment of the site justified and deliverable in the current economic climate?
- Q17.35 How would the site be phased?
- Q17.36 Given the challenges and complexities of bringing the site forward, is it realistic to expect any delivery in the first five years?

5. Land at Conington Road and Lewisham Road (Tesco)

- Q17.37 What will the net change in retail/town centre uses be? What effect will this have on the retail/town centre requirement for Lewisham Town Centre?
- Q17.38 How were the proposed mix of uses determined? Is the approach to defining site capacities for each land use robust and realistic?
- Q17.39 How is it intended to phase the development given the intention to provide a temporary store?

17. Catford Shopping Centre and Milford Towers and

18. Catford Island

- Q17.40 What status do the Catford Town Centre Framework and the A21 Development Framework have?

- Q17.41 How were the proposed mix of uses determined? Is the approach to defining site capacities for each land use robust and realistic?
- Q17.42 Overall, would there be a net gain or loss of main town centre uses/commercial/employment/community uses?
- Q17.43 Will the proposed retail element achieve the identified retail floorspace requirement for Catford centre?
- Q17.44 Does the policy enable sufficient flexibility?
- Q17.45 Is the approach for the comprehensive redevelopment of the site justified and deliverable in the current economic climate?
- Q17.46 How would the site be phased?
- Q17.47 Given the challenges and complexities of bringing the site forward, it is realistic to expect any delivery in the first five years?

19. Lawrence House and Civic Centre

- Q17.48 How will the proposed realignment of the A205 affect the timing and phasing of the site?

20. Re-route of south circular

- Q17.49 Have exceptional circumstances been demonstrated to justify the loss of the Metropolitan Open Land?
- Q17.50 How do the proposals take account of the existing use of the Jubilee Sports Ground?

MATTER 18 - LEWISHAM'S NORTH AREA ALLOCATIONS

Issue - Whether the proposed North Area allocations are justified, effective and consistent with national policy?

Relevant policies: LNA1; LNA2; LNA3; LNA4; and Site allocations LNA SA 1-19

Vision and Key Spatial Objectives

- Q18.1 Are the vision and spatial objectives justified, effective and consistent with national policy and in general conformity with the London Plan?

Policy LCA1 North Area place principles

- Q18.2 Are the North Area place principles justified, effective and consistent with national policy and in general conformity with the London Plan.

Policy LNA2 New Cross Road/A2 Corridor

- Q18.3 Criterion D refers to new transport infrastructure and public realm improvements. What is the progress on these?

Q18.4 Overall, is Policy LNA2 justified, effective, consistent with national policy and in general conformity with the London Plan.

Policy LNA3 Creative Industries Zone

Q18.5 Is criterion D (a) sufficiently flexible to ensure the policy is effective?

Q18.6 Is the Creative Industries Zone compatible with SIL?

Q18.7 How would a Creative Industries Zone located within a SIL be managed?

Q18.8 Overall, is Policy LNA3 justified, effective, consistent with national policy and in general conformity with the London Plan?

Policy LNA4 Thames Policy Area and Deptford Creekside

Q18.9 What is the background and justification for this area?

Q18.10 Is the expected timescale and rate of development realistic?

Q18.11 Overall, is Policy LNA4 justified, effective, consistent with national policy and in general conformity with the London Plan?

Taking each of the 19 proposed sites individually:

In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations, for example in terms of adverse impacts, delivery and so on.

Q18.12 What is the background to the site allocation? How was it identified and which options were considered?

Q18.13 Are the site areas and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Q18.14 What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, pollution, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would the policy safeguards and proposed mitigation be sufficiently effective?

Q18.15 Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Q18.16 What effect will the allocations have on the highway network(s)? Where necessary, is it clear to decision-takers, developers, and local communities what the necessary highway improvements consist of, who will be responsible for delivering them and when?

Q18.17 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

- Q18.18 Is the development proposed viable and deliverable within the plan period?
- Q18.19 If the site is already under construction, how much has been constructed to date?
- Q18.20 What is the situation in relation to land ownership and developer interest?
- Q18.21 How is it intended to bring the site forward for development?
- Q18.22 What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?
- Q18.23 Is the expected timescale and rate of development realistic?
- Q18.24 Are any modifications necessary in the interests of soundness?

Further questions relating to specific allocations:

1. Convoys Wharf Mixed Use Employment Location

- Q18.25 Is the site sufficiently accessible for future users, including by cars given the low PTAL rating?
- Q18.26 How has the residential capacity been determined? Is the allocation and masterplan sufficiently flexible and positively prepared to potentially accommodate more development?
- Q18.27 Should the boundary of the safeguarded land be updated to illustrate the extended safeguarded land?
- Q18.28 Should the development guidelines for the residential uses include reference to the need for the detailed design and layout to respect wharf activities and incorporate suitable mitigation to avoid future conflict of adjacent uses? Is the wording in paragraph 15.26, point 7 sufficient?
- Q18.29 How is the site to be phased over 15 years? Is it realistic and deliverable?

2. Deptford Landings Mixed Use Employment Location (formerly known as Oxetalls Road) and Scott House

- Q18.30 Should the development guidelines for the residential uses include reference to the need for the detailed design and layout to respect wharf activities and incorporate suitable mitigation to avoid future conflict of adjacent uses? Is the wording in paragraph 15.26, point 7 sufficient?
- Q18.31 How is the site to be phased over 15 years? Is it realistic and deliverable?

3. Evelyn Court LSIS

Q18.32 How has the site capacity been derived? Is there scope to optimise the site capacity and increase the number of residential units on this site?

Q18.33 Given the planning status indicated in the Plan, has this site progressed beyond the pre-application stage? Is it realistic to assume it would be delivered within years 1-5?

6. Apollo Business Centre LSIS

Q18.34 How will the existing waste use on the site be affected by the proposed allocation?

8. Bermondsey Dive Under

Q18.35 Is the proposed combined SIL and LSIS compatible with the character of Silwood Street?

Q18.36 Does the Plan need to identify which parts of the site are the SIL and which parts are the LSIS? How much of the proposed floorspace is SIL and how much is LSIS?

Q18.37 What evidence is available to demonstrate the suitability of the access to this site for all forms of potential employment uses?

9. Surrey Canal Triangle Mixed Use Employment Location

Q18.38 Is it reasonable to require the delivery of off-site transport infrastructure? Should this be reflected in the development requirements, paragraph 15.64, number 6?

Q18.39 Is development requirement number 8 realistic and deliverable?

11. Former Hatcham Works, New Cross Road

Q18.40 Would it be effective to refer to the site by its current name of uses rather than by a name of a former use?

Q18.41 Is there a realistic prospect of the proposed Bakerloo Line Extension being delivered?

Q18.42 Has any assessment been undertaken as to the effect of the safeguarded land and the tunnelling worksite on the existing supermarket operations?

Q18.43 Is the delivery timescale for this site realistic?

15. Albany Theatre

Q18.44 Should the development guidelines make specific reference to ensuring that the design will protect the amenity of surrounding occupiers when considering the operational needs of the theatre?

16. Land north of Reginald Road and south of Frankham Street (former Tidemill School)

Q18.45 Should the development requirements relating to new public realm and landscaped square seek to retain, incorporate and improve any existing open green space and mature trees on site?

17. Lower Creekside Locally Significant Industrial Site

Q18.46 Are the requirements for a new and improved public realm, increased waterside access and amenity space realistic and deliverable? How would these affect the boating community in this location?

Q18.47 Is the number of proposed residential units realistic?

18. Sun Wharf Mixed Use Employment Location (including Network Rail Arches)

Q18.48 Is development requirement number 5 to require the delivery of both off-site cycleways justified and effective?

Q18.49 Should it be a development requirement rather than a development guideline for developers to work with the Environment Agency in relation to suitable green infrastructure improvements and flood risk management measures?

Q18.50 Is the Plan sufficiently clear about the proximity of Brewer's Wharf in development guideline number 6?

Q18.51 Is the site allocation in general conformity with the London Plan, specifically Policy E7C?

MATTER 19 – LEWISHAM'S EAST AREA ALLOCATIONS

Issue - Whether the proposed East Area allocations are justified, effective and consistent with national policy?

Relevant Policies: LEA1; LEA2; LEA3; LEA4 and Site allocations LEA SA 1-8

Vision and Key Spatial Objectives

Q19.1 Are the vision and spatial objectives justified, effective and consistent with national policy and in general conformity with the London Plan?

East Area place principles (Policy LEA1)

Q19.2 Are the East Area place principles justified, effective and consistent with national policy and in general conformity with the London Plan.

Lee Green district centre and surrounds (*Policy LEA2*)

Q19.3 Overall, is Policy LEA2 justified, effective, consistent with national policy and in general conformity with the London Plan.

Strategic Area for Regeneration, Grove Park (*Policy LEA3*)

Q19.4 Overall, is Policy LEA3 justified, effective, consistent with national policy and in general conformity with the London Plan.

Linear network of Green Infrastructure (*Policy LEA4*)

Q19.5 Overall, is Policy LEA4 justified, effective, consistent with national policy and in general conformity with the London Plan.

Lewisham East Area Site Allocations

Taking each of the 8 proposed sites individually:

NB In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations, for example in terms of adverse impacts, delivery and so on.

Q19.6 What is the background to the site allocation? How was it identified and which options were considered?

Q19.7 Are the site areas and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?

Q19.8 What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, pollution, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would the policy safeguards and proposed mitigation be sufficiently effective?

Q19.9 Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.

Q19.10 What effect will the allocations have on the highway network(s)? Where necessary, is it clear to decision-takers, developers, and local communities what the necessary highway improvements consist of, who will be responsible for delivering them and when?

Q19.11 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?

Q19.12 Is the development proposed viable and deliverable within the plan period?

- Q19.13 If the site is already under construction, how much has been constructed to date?
- Q19.14 What is the situation in relation to land ownership and developer interest?
- Q19.15 How is it intended to bring the site forward for development?
- Q19.16 What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?
- Q19.17 Is the expected timescale and rate of development realistic?
- Q19.18 Are any modifications necessary in the interests of soundness?

Further questions relating to specific allocations:

3. Leegate Shopping Centre and

4. Sainsbury's Lee Green

- Q19.19 How were the proposed mix of uses determined? Is the approach to defining site capacities for each land use robust and realistic?
- Q19.20 How would the sites be phased?
- Q19.21 Overall, would there be a net gain or loss of main town centre uses/commercial/employment/community uses?
- Q19.22 Would the proposed retail element achieve the identified retail floorspace requirement for Leegate Shopping Centre?
- Q19.23 Do the policies enable sufficient flexibility?
- Q19.24 Is the approach for the comprehensive redevelopment of the sites justified and deliverable in the current economic climate?
- Q19.25 Given the challenges and complexities of bringing the site forward, is it realistic to expect any delivery in the first five years?

6. Southbank Mews

- Q19.26 Whilst the development requirements state that the maximum viable amount of employment floorspace must be re-provided, in line with Policy EC8 (Non-designated employment sites) is the loss of non-designated employment land justified?

8. Sainsbury Local and West of Grove Park Station

- Q19.27 What options are there for the retention of re-provision or the existing bus stand/station?

MATTER 20 – LEWISHAM’S SOUTH AREA ALLOCATIONS

Issue - Whether the proposed South Area allocations are justified, effective and consistent with national policy?

Relevant Policies: LSA1; LSA2; LSA3; LSA4 and Site allocations LSA SA 1-14

Vision and Key Spatial Objectives

Q20.1 Are the vision and spatial objectives justified, effective and consistent with national policy and in general conformity with the London Plan?

South Area place principles (Policy LSA1)

Q20.2 Are the South Area place principles justified, effective and consistent with national policy and in general conformity with the London Plan.

Q20.3 What mechanisms will the Council use to ensure that development is appropriately phased in order to ensure there is adequate infrastructure capacity in place to cope with the additional demands generated by new development (criterion c)?

Strategic Area for Regeneration (Policy LSA2)

Q20.4 Is Policy LSA2 justified, effective, consistent with national policy and in general conformity with the London Plan.

Bell Green and Lower Sydenham (Policy LSA3)

Q20.5 Where is the evidence to support the potential designation of an Opportunity Area at Bell Green and Lower Sydenham in a future review of the London Plan?

Q20.6 What is the timescale for the preparation of the SPD or masterplan?

Q20.7 Does part C (a) sufficiently differentiate between ‘safeguarding’ as a matter of planning policy and formal safeguarding directions made by the Secretary of State for Transport on 1 March 2021 in respect of the Bakerloo Line Extension?

Q20.8 What is the evidence to support the provision of a new Local Centre? Is this justified?

Q20.9 Overall, is Policy LSA3 justified, effective, consistent with national policy and in general conformity with the London Plan.

A21 Corridor/Bromley Road (Policy LSA4)

Q20.10 Overall, is Policy LSA4 justified, effective, consistent with national policy and in general conformity with the London Plan.

Lewisham South Area Site Allocations

Taking each of the 14 proposed sites individually:

NB In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations, for example in terms of adverse impacts, delivery and so on.

- Q20.11 What is the background to the site allocation? How was it identified and which options were considered?
- Q20.12 Are the site areas and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?
- Q20.13 What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, pollution, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would the policy safeguards and proposed mitigation be sufficiently effective?
- Q20.14 Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.
- Q20.15 What effect will the allocations have on the highway network(s)? Where necessary, is it clear to decision-takers, developers, and local communities what the necessary highway improvements consist of, who will be responsible for delivering them and when?
- Q20.16 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
- Q20.17 Is the development proposed viable and deliverable within the plan period?
- Q20.18 If the site is already under construction, how much has been constructed to date?
- Q20.19 What is the situation in relation to land ownership and developer interest?
- Q20.20 How is it intended to bring the site forward for development?
- Q20.21 What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?
- Q20.22 Is the expected timescale and rate of development realistic?
- Q20.23 Are any modifications necessary in the interests of soundness?

Further questions relating to specific allocations:

1. Former Bell Green Gas Holders and Livesey Memorial Hall'

2. Bell Green Retail Park and

3. Sainsbury's Bell Green

- Q20.24 What is the status of the Masterplan for the Bell Green and Lower Sydenham Area? Is it appropriate to require compliance with the masterplan if it has not been adopted or consulted upon yet?
- Q20.25 Given the acknowledged challenges associated with the significant decontamination and remediation of site 1, is the estimated timeframe of 1-5 years for delivery of the site realistic?
- Q20.26 Is the approach to tall new buildings set out in the development guidelines justified?
- Q20.27 How has the indicative main town centre use floorspace been arrived at? How has the Council considered the potential impact of the proposed retail development on adjacent town centres given the out-of-centre location.
- Q20.28 In relation to sites 2 and 3 what would the net loss/gain of retail floorspace be compared to the existing?
- Q20.29 In relation to site 3, what effect would the proposal have on convenience goods provision in the area.
- Q20.30 Is the approach to the safeguarding of land for the Bakerloo Line Extension line justified?

4. Stanton Square Locally Significant Industrial Site and

6. Worsley Bridge Road Locally Significant Industrial Site (LSIS)

- Q20.31 Whilst the development requirements state that the maximum viable amount of employment floorspace must be re-provided, in line with Policy EC6 (LSIS) is the loss of non-designated employment land justified?
- Q20.32 For site 4, is it appropriate to include the art-deco Old Bathhouse within the site boundary?

8. Land at Pool Court

- Q20.33 How was the site selected? What options were considered?
- Q20.34 How can the site be made safe from flooding for future residents?
- Q20.35 What measures would be put in place to protect and enhance the biodiversity interest of the site and the Site of Nature Conservation Importance?
- Q20.36 Is the site home to non-designated industrial uses? If so, how would the site comply with Policy E7C of the London Plan 2021?

Q20.37 Would the site meet the identified requirement for Gypsy and Traveller accommodation?

10. Homebase/Argos, Bromley Road and

12. Downham Co-op

Q20.38 What would the net loss/gain of retail floorspace be compared to the existing?

Q20.39 How has the indicative main town centre use floorspace been arrived at? How has the Council considered the potential impact of the proposed retail development on adjacent town centres given the out-of-centre location.

MATTER 21 – LEWISHAM’S WEST AREA ALLOCATIONS

Issue - Whether the proposed West Area allocations are justified, effective and consistent with national policy?

Relevant Policies: LWA1; LWA2; LWA3; and Site allocations LWA SA 1-12

Vision and Key Spatial Objectives

Q21.1 Are the vision and spatial objectives justified, effective and consistent with national policy and in general conformity with the London Plan?

West Area place principles (Policy LWA1)

Q21.2 Are the West Area place principles justified, effective and consistent with national policy and in general conformity with the London Plan.

Connected network of town centres (Policy LWA2)

Q21.3 Does Policy LWA2 support the vitality and viability of the West area’s town centres?

Q21.4 Overall, is Policy LWA2 justified, effective, consistent with national policy and in general conformity with the London Plan?

Forest Hill district centre and surrounds (Policy LWA3)

Q21.5 Is the proposed extension of the boundary of the Malham Road Locally Significant Industrial Site (LSIS) to include 118 Stansted Road justified and supported by the evidence (Part B.d)?

Q21.6 Overall, is Policy LWA3 justified, effective, consistent with national policy and in general conformity with the London Plan?

Taking each of the 12 proposed sites individually:

NB In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations, for example in terms of adverse impacts, delivery and so on.

- Q21.7 What is the background to the site allocation? How was it identified and which options were considered?
- Q21.8 Are the site areas and capacity assumptions justified and based on available evidence having regard to any constraints and the provision of necessary infrastructure?
- Q21.9 What are the potential adverse impacts of developing the site and how could these be mitigated for example in terms of transport/traffic, pollution, nature conservation, landscape and countryside, heritage assets and the impact on flood risk? Would the policy safeguards and proposed mitigation be sufficiently effective?
- Q21.10 Where applicable, where is the evidence to support that the Sequential Test and Flood Risk Exceptions Test have been satisfied for relevant sites.
- Q21.11 What effect will the allocations have on the highway network(s)? Where necessary, is it clear to decision-takers, developers, and local communities what the necessary highway improvements consist of, who will be responsible for delivering them and when?
- Q21.12 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
- Q21.13 Is the development proposed viable and deliverable within the plan period?
- Q21.14 If the site is already under construction, how much has been constructed to date?
- Q21.15 What is the situation in relation to land ownership and developer interest?
- Q21.16 How is it intended to bring the site forward for development?
- Q21.17 What mechanisms are there to ensure a comprehensive and co-ordinated approach to development with infrastructure requirements that are provided?
- Q21.18 Is the expected timescale and rate of development realistic?
- Q21.19 Are any modifications necessary in the interests of soundness?

Further questions relating to specific allocations:

4. Land at Forest Hill Station east and

5. Land at Forest Hill Station West

Q21.20 Whilst the development requirements state that the maximum viable amount of employment floorspace must be re-provided, in line with Policy EC8 (Non-designated employment sites) is the loss of non-designated employment land justified?

6. Perry Vale LSIS and

7. Clyde Vale LSIS and

9. Willow Way LSIS

Q21.21 Whilst the development requirements state that there must not be a net loss of industrial capacity, the proposed allocations would, nevertheless, result in the net loss of LSIS land. Is this approach consistent with the NPPF and in general conformity with the London Plan?

Q21.22 How would it be ensured that the proposed mix of uses would be compatible?

MATTER 22 – VIABILITY

ISSUE – Taking account of the cumulative scale of Community Infrastructure Levy (CIL), obligations and policy requirements, is the Plan deliverable?

Q22.1 Has the Local Plan Viability Assessment (LPVA) (2022) (and predecessor documents) been subject to consultation/stakeholder engagement to 'sense check' the assumptions and approach used? How has any feedback been taken into account?

Q22.2 The LPVA states at page 6 that delivering new employment floorspace is unlikely to be viable on a purely commercial basis without cross-subsidy from other uses. Where is the evidence to support that assumption?

Q22.3 Are the appraisal assumptions set out at section 4 of the LPVA based on robust evidence?

Q22.4 What is the evidence to support the allowance of up to £2,000 per unit for residential development and up to £25 per m² for non-residential development for residual Section 106 requirements?

Q22.5 What is the evidence to support the allowance for Section 278 works of £1,000 per residential unit and £15 per square metre for commercial developments?

Q22.6 What effect would the requirement for sites of between 2 and 9 dwellings set out in part J of Policy HO3 have on the viability of small sites?

- Q22.7 Are there any particular typologies of sites which would struggle with viability?
- Q22.8 Overall, taking into account the cumulative scale of CIL, obligations and policy requirements, is the Plan deliverable?

MATTER 23 – DELIVERY AND MONITORING

ISSUE – Whether the Plan is justified, effective, consistent with national policy and in general conformity with the London Plan in relation to the delivery of infrastructure to support communities and the growth strategy and whether the Monitoring Framework for the Local Plan is justified, effective and consistent with national policy?

INFRASTRUCTURE

Infrastructure Delivery Plan (IDP)

- Q23.1 Does the IDP contain the full range of infrastructure necessary to support the development proposed in the Plan?
- Q23.2 Has the IDP been updated to clarify the 'unconfirmed' matters in the 2023 version (PD07)?
- Q23.3 Does the IDP provide confidence that the necessary infrastructure will be in place to ensure the delivery of the Local Plan spatial strategy and various allocations?
- Q23.4 How will the Infrastructure Delivery Plan respond to changing circumstances?

Policy DM1 Stakeholders

- Q23.5 Is this a statement of intent setting out how the Council will engage with stakeholders as opposed to a policy?

Policy DM2 Infrastructure funding and planning obligations

- Q23.6 What is the timescale for the review of the Community Infrastructure Levy?
- Q23.7 Does Part D provide sufficient clarity to developers as to when planning obligations and/or contributions will be sought in relation to new development.
- Q23.8 Has the Whole Plan Viability Appraisal taken the proposed obligations/contributions into account in assessing the viability of the Local Plan?
- Q23.9 Does Part D provide sufficient clarity as to when any facilities/requirements should be provided on site or where off-site provision, or a financial contribution, would be appropriate?

Q23.10 Paragraph 19.11 of the supporting text refers to circumstances where reduced contributions would be justified in relation to viability. Should viability considerations be included in the policy itself as opposed to the supporting text? Overall, does the Policy provide sufficient flexibility to take account of viability considerations?

Policy DM3 Masterplans and comprehensive development

Q23.11 Is a site masterplan necessary for all development proposals? What status would the site masterplan have?

Q23.12 Is the requirement of an outline application to be accompanied by a full planning application for the first phase of the development (part B) justified and consistent with the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended)?

Policy DM4 Land Assembly

Q23.13 Overall, is the policy justified, effective and consistent with national policy and legislation and in general conformity with the London Plan?

Policy DM5 Meanwhile Uses

Q23.14 Could part A of the policy preclude a potential temporary/meanwhile use which falls outside of the circumstances set out in Part A (a-d) for which there is a genuine need?

Policy DM6 Health Impact Assessments (HIA)

Q23.15 Is it clear what a 'desktop' HIA entails? What is the difference between a desktop HIA and a detailed HIA? Are there circumstances where a detailed HIA would necessitate a detailed HIA which would not be of a scale referable to the GLA. How would the Council deal with this?

Q23.16 Overall, is it clear to developers and users of the Local Plan when a desktop or a detailed HIA would be required?

Policy DM7 Monitoring and Review and the Monitoring Framework

Q23.17 Is Policy DM7 more of a statement of intent as opposed to a policy which would be used?

Q23.18 Does the Monitoring Framework provide an effective mechanism for monitoring all of the policies in the Plan?

Q23.19 How will the implementation of the Plan be monitored in terms of its effectiveness and any unintended consequences?

Q23.20 Are clear contingency measures in place to address any issues arising from the monitoring process, such as non-delivery or lower delivery of housing and employment allocations in the Plan?

Q23.21 What mechanisms are there to assist development sites to progress?

Q23.22 How will the non-strategic policies of the Plan be monitored?

- Q23.23 Are the proposed monitoring indicators set out in Table 19.1 measurable? How would the results of monitoring be acted upon?
- Q23.24 Are suitable arrangements in place for reviews of the policies (either separately or as part of the wider plan) in a timely manner?
- Q23.25 Is there any duplication of the Lewisham Local Performance Indicators (LPI) with the Key Performance Indicators (KPIs) used for monitoring the London Plan?
- Q23.26 How will development viability and trends be monitored?
- Q23.27 What would trigger future remedial action including a development plan review?
- Q23.28 Are any modifications necessary for soundness?